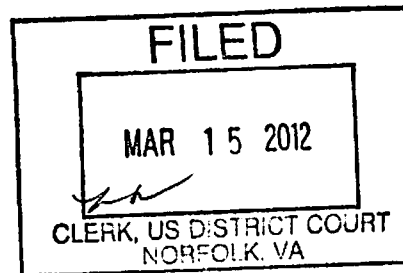


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division



DALE BURTON GHOLSON,

Plaintiff,

v.

Case No. 2:12cv142

IBRAHIN FLORIN,

and

FLORES BOYS TRUCK LINES, L.L.C.,

Defendants.

**NOTICE OF REMOVAL**

Defendants Ibrahim Florin and Flores Boys Truck Lines, L.L.C., by counsel, file this Notice of Removal pursuant to 28 U.S.C. §§ 1441 and 1446, on the following grounds:

1. This civil action was commenced by the filing of a Complaint on or about February 21, 2011, and is currently pending in the Circuit Court of the City of Norfolk, Virginia. Copies of all process, pleadings, papers and orders filed in the Norfolk Circuit Court are attached to this Notice as **Exhibit A.**
2. Ibrahim Florin was served on February 23, 2012. Defendants have filed an Answer in the Circuit Court for the City of Norfolk, Virginia, contemporaneously with this Notice of Removal.
3. No further proceedings have been had in this action.
4. The amount in controversy in the action, exclusive of interest and cost, exceeds \$75,000.00.

5. Plaintiff Dale Burton Gholson is, and was at the time this action was filed, a citizen and resident of the Commonwealth of Virginia.

6. Defendant Ibarhin Florin is, and was at the time this action was filed, a resident of the State of Florida. He was not and is not now a citizen of the Commonwealth of Virginia.

7. Defendant Flores Boys Truck Lines, L.L.C. is, and was at the time this action was filed, a corporation incorporated in the State of Florida, with its principal place of business in the State of Florida. It was not and is not now a citizen of the Commonwealth of Virginia.

8. This action involves a controversy wholly between citizens of different states. There is complete diversity of citizenship.

9. This Court has original jurisdiction in this action pursuant to 28 U.S.C. § 1332(a), and the action may therefore be removed to this Court pursuant to 28 U.S.C. § 1441(a).

10. Defendants desire to remove this action to this Court.

10. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is filed within thirty (30) days after receipt by Defendants of Plaintiff's Complaint.

WHEREFORE, Defendants Ibrahin Florin and Flores Boys Truck Lines, L.L.C., by counsel, respectfully request that the above-entitled action be removed from the Circuit Court of the City of Norfolk, Virginia, to this Court.

**IBRAHIN FLORIN and  
FLORES BOYS TRUCK LINES, L.L.C.**

By Counsel



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**CERTIFICATE**

I hereby certify that a true copy of the foregoing Notice was mailed, postage prepaid, to Carlton F. Bennett, Esq., Bennett & Zydron, P.C., 120 South Lynnhaven Road, Suite 100, Virginia Beach, Virginia, 23452, this 1<sup>st</sup> day of March, 2012.



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